



*Litigation*, Case No. 2:21-mc-01230 (W.D. Pa.) (JFC) (the “MDL”). In support, Defendants rely on the attached memorandum of law. This motion is unopposed.

Respectfully submitted,

**HALL BOOTH SMITH, P.C.**

/s/ Beth Boone

Beth Boone  
3528 Darien Highway  
Suite 300  
Brunswick, GA 31525  
Telephone: 912.554.0093  
Facsimile: 912.554.1973  
BBoone@hallboothsmith.com

*Counsel for Defendants Philips RS North America LLC, Philips North America LLC, and Philips Healthcare Informatics, Inc.*

John P. Lavelle, Jr.  
**MORGAN, LEWIS & BOCKIUS  
LLP**  
1701 Market Street  
Philadelphia, PA 19103-2921  
Telephone: +1.215.963.5000  
Facsimile: +1.215.963.5001  
*john.lavelle@morganlewis.com*

*Of Counsel for Defendants Philips RS North America LLC*

Michael H. Steinberg  
**SULLIVAN & CROMWELL LLP**  
1888 Century Park East  
Los Angeles, CA 90067-1725  
Telephone: +1.310.712.6670  
Facsimile: +1.310.712.8800  
*steinbergm@sullcrom.com*

William B. Monahan  
**SULLIVAN & CROMWELL LLP**  
125 Broad Street  
New York, NY 10004-2498  
Telephone: +1.212.558.7375  
Facsimile: +1.212.558.3588  
*monahanw@sullcrom.com*

Dated: May 17, 2022

*Of Counsel for Defendant Philips North America LLC and Philips Healthcare Informatics, Inc.*

**CERTIFICATE OF SERVICE**

I, Beth Boone, an attorney, certify that I filed the foregoing using the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record on this 17th day of May, 2022.

/s/ Beth Boone